IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NORTH DAKOTA

In re:) Case No. 25-30004
THE RUINS, LLC) Chapter 11
Debtor)))

Motion to Sell Substantially All Assets of the Debtor, Free and Clear of All Liens

Comes now The Ruins, LLC (the "Ruins" or the "Debtor"), by and through undersigned counsel, pursuant to Section 363 of Title 11 of the United States Code, and moves this Honorable Court to authorize a sale of substantially all assets of the Debtor, through duly noticed public auction, at a time and place to be established at a hearing upon this motion, and in support thereof states as follows:

The Ruins, as part of a global settlement discussion, intends to pursue a sale of substantially all of the Debtor's assets. The details of such a sale, alongside a lengthier memorandum in support of this motion, will be docketed prior to a hearing on this motion.

The foregoing notwithstanding, should the parties fail to reach a definitive agreement on plans of reorganization in two related (but not jointly administered) matters on or before October 14, 2025, the Debtor reserves its right to withdraw this motion.

Case 25-30004 Doc 116 Filed 09/28/25 Entered 09/28/25 18:43:52 Desc Main Document Page 2 of 2

Respectfully Submitted,

Dated: September 28, 2025 By: /s/ Maurice B. VerStandig

Maurice B. VerStandig, Esq. The Dakota Bankruptcy Firm

1630 1st Avenue N Suite B PMB 24

Fargo, North Dakota 58102-4246

Phone: (701) 394-3215 mac@dakotabankruptcy.com *Counsel for the Debtors*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of September, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig